

EXHIBIT B-32

Aaron Meade – December 3, 2015

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1 IN THE UNITED STATES DISTRICT COURT
 2 FOR THE NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION

3	AARON SENNE, et al.,)	
4	Plaintiffs,)	
	vs.)	
5	OFFICE OF THE COMMISSIONER)		CASE NO.
	OF BASEBALL, an)	3:14-cv-00608-JCS
6	unincorporated)	(consolidated with
	association doing business)		3:14-cv-03289-JCS)
7	as MAJOR LEAGUE BASEBALL,)	
	et al.,)	
8	Defendants.)	
9)	

10

11 ORAL VIDEOTAPED DEPOSITION OF

12 AARON MEADE

13 DECEMBER 3, 2015

14

15 ORAL VIDEOTAPED DEPOSITION OF AARON MEADE, produced

16 as a witness at the instance of the Defendants and duly

17 sworn, was taken in the above-styled and numbered cause

18 on the 3rd day of December, 2015, from 9:00 a.m. to

19 4:41 p.m., before Melinda Barre, Certified Shorthand

20 Reporter in and for the State of Texas, reported by

21 computerized stenotype machine at the offices of

22 Deloitte, 100 South 4th Street, St. Louis, Clayton

23 County, Missouri, pursuant to the Federal Rules of Civil

24 Procedure and the provisions stated on the record or

25 attached hereto.

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1 would have the video. There were times I was way out in
2 the outfield with a video camera having to do it.

3 Q. So you mentioned duties earlier. One duty was
4 charting?

5 A. Uh-huh.

6 Q. Another is video recording?

7 A. There's that. Radar gun was one of them.

8 Q. Any others?

9 A. Not that I can think of off the top of my head.

10 Q. If you were in a part of the season where you
11 were a relief pitcher, so you didn't know if you were
12 going to pitch or not, where would you be during the
13 game?

14 A. That depended on the coach. Some coaches would
15 have you in the dugout. Some would have you in the
16 bullpen.

17 Q. What would you do after a game ended at home?

18 A. At home? Did I pitch that day?

19 Q. Let's start with a day you pitched.

20 A. Okay. I mean, depending on when I came out of
21 the game, I would usually immediately have to go in the
22 locker room. You'd have to get with a trainer and do
23 stretching, do a whole shoulder program. And then you
24 would ice and stuff like that. And if you were one of
25 the later pitchers, usually that's when you would do

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1 that after the game. But immediately after we would
2 have a team meeting.

3 Q. What would you do in that team meeting?

4 A. Just listen to the coach talk about the
5 positives, negatives, what we need to work on.

6 Q. Approximately how long would a team meeting
7 last after a game?

8 A. It just depended. It could go anywhere from 5
9 minutes to 30 minutes, 40 minutes.

10 Q. How about on a day that you weren't pitching,
11 what would you do after a game?

12 A. That day you would basically be at the team
13 meeting. You'd have to get down from the stands and be
14 there for the team meeting. And then that was basically
15 it because you were already showered and ready to go.
16 You would have done all your stuff for the day. By that
17 time you were done.

18 Like for me and my roommate, if he threw
19 that day, I mean, we were on different schedules. So I
20 would have to wait for him or he would have to wait for
21 me kind of a thing since we only had the one car.

22 Q. After a day which you had pitched,
23 approximately what time would you leave the complex or
24 the stadium?

25 A. I don't know. Probably anywhere between 30, 45

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1 minutes after the game.

2 Q. And on a day that you were not pitching, what
3 time would you leave the stadium?

4 A. If I was a relief pitcher and didn't throw, it
5 would still be about the same because I would have to
6 clean up and shower and everything. You had to turn
7 your laundry in and have it on a loop. If I was in
8 these clothes in the stands, a lot of it just varied on
9 whether I had to wait on my roommate or not. There
10 would be times I'd sit there for 30 minutes waiting on
11 him to do his treatment on his arm or shower and
12 everything.

13 Q. But that was only because you drove together?

14 A. Yeah. We only had one car.

15 Q. And on days you didn't have to wait for him and
16 you were in street clothes and ready to go home?

17 A. We would just leave right after the team
18 meeting probably.

19 Q. Now let's talk about day games at home. So
20 those Sunday games that you were talking about?

21 A. Okay.

22 Q. Your schedule on a day for a Sunday game, what
23 time did those day games start?

24 A. I believe 2:00.

25 Q. So for a 2:00 game, what time would you arrive

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1 Q. (By Ms. Santoro) Mr. Meade, we just discussed
2 three off-seasons, the 2010/2011 off-season, the
3 2011/2012 off-season and the 2012/2013 off-season,
4 correct?

5 A. Yes.

6 Q. After each of those off-seasons did you arrive
7 to spring training in shape?

8 A. Yeah. I was in shape. I usually would get
9 there earlier.

10 Q. What do you mean you would get there earlier?

11 A. It was always something that was kind of
12 recommended to you. You didn't have to, but it was
13 recommended if you show up earlier. I figured me being
14 from the Midwest, it's cold and stuff, to try and
15 acclimate myself. So I'd get there about a week early.

16 Q. A week prior to the report day for spring
17 training?

18 A. Yeah.

19 Q. Where did you stay when you got there earlier?

20 A. You usually had to find a hotel somewhere.

21 Q. That was your choice?

22 A. Yes.

23 Q. Was there any kind of physical conditioning
24 tests when you arrived at spring training?

25 A. Yes.

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1 Q. Can you describe that test for me?

2 A. Well, I remember one of them was they called it
3 like the 300-yard shuttle test; and you'd have three of
4 them. There was like three 300-yard shuttles in a
5 certain amount of time. I don't remember what it was.

6 Q. Were there any consequences of not following
7 training guidelines when you arrived at spring training?

8 A. I mean, there's consequences if you fail like
9 your conditioning tests and stuff like that. I don't
10 necessarily remember what they were.

11 Q. It's your testimony that you don't remember
12 what those consequences were?

13 A. Yes. I don't remember what they were exactly.

14 Q. Were you ever disciplined or were there any
15 consequences for you based on your condition at the
16 beginning of the spring training?

17 A. No. I never had to -- I don't remember what it
18 was for, but I had to go to what they called fat camp
19 kind of. And I had to do that for a couple days. It
20 was like extra running. So I don't remember what it was
21 for, but I do remember having to do it.

22 Q. And when you say fat camp, is fat camp just
23 extra running?

24 A. Yeah. Basically for guys. It necessarily
25 wasn't when I was overweight; but for guys that were

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1 overweight, they would have to do extra.

2 Q. Any other consequences you're aware of for not
3 showing up in shape at the beginning of spring training?

4 A. Outside of getting released, having to stay in
5 extended spring training, no.

6 Q. Are you aware of anybody that was released
7 because they did not show up at spring training in
8 shape?

9 A. Not spring training. I do remember -- I can't
10 remember his name. I know he was from New York, a big
11 guy; and they actually sent him home and told him he
12 couldn't come back until he lost like 15 or 20 pounds
13 basically.

14 Q. They sent him home from spring training?

15 A. I don't remember if it was spring training or
16 extended. It was one of the two. He'd have to be on
17 the treadmill every day and stuff.

18 Q. So they sent him home?

19 A. Yeah. They sent him back to his house and told
20 him to lose weight.

21 Q. After he was sent home, did you observe him
22 coming back at some point?

23 A. I don't remember. I don't remember if he came
24 back or not.

25 Q. So you don't have any knowledge regarding what

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1 happened to this individual?

2 A. I know he ended up getting released down the
3 road. I don't know when and stuff like that, no.

4 Q. Do you know whether him getting released was
5 because of this extra weight he had to lose, or you just
6 don't have any personal knowledge regarding that?

7 A. I don't have any more knowledge besides the
8 fact that he was sent home because he was overweight.

9 Q. You also mentioned another consequence was
10 going to extended spring training?

11 A. Yeah. Well, that was just something. Extended
12 spring training was where you didn't break with the
13 team. So if you weren't ready to go, you weren't going
14 to break with the team.

15 Q. Are you aware of anybody who was sent to
16 extended spring training because they failed the
17 conditioning test when they arrived at spring training?

18 A. Not necessarily because they failed the
19 conditioning test, no.

20 Q. You mentioned -- I believe you testified
21 earlier that you don't work out consistently now. Is
22 that correct?

23 A. Yes.

24 Q. While you were a baseball player -- so when I
25 say a baseball player, I mean while you played in the

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1 Minors, while you played in college, while you played in
2 high school. Is it fair to say at that point in time
3 that working out and keeping in shape was something that
4 was personally important to you?

5 A. I mean, yeah. I wanted to play baseball; and I
6 knew I needed to be in shape to play or to be where I
7 wanted to be, yeah.

8 Q. So it was important to you at that point in
9 time?

10 A. Yeah, definitely.

11 Q. The off-season conditioning that we just
12 discussed over those three off-seasons, did you perform
13 all of that conditioning work in either, I believe you
14 said, Kansas City, Missouri one year?

15 A. Uh-huh.

16 Q. Springfield, Missouri one year?

17 A. Kansas City, two; Springfield, one.

18 Q. Okay.

19 A. Yeah.

20 Q. Other than Springfield and Kansas City,
21 Missouri did you perform off-season conditioning
22 anywhere else?

23 A. Not necessarily other than -- I know we went to
24 Vegas and we worked out there and we were there for a
25 week and stuff or however long we were there.

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1 Q. Do you recall when you went to Vegas?

2 A. I can't remember. I think it was early 2012
3 maybe.

4 Q. Was it one trip?

5 A. Yeah.

6 Q. Do you recall about how long the trip was?

7 A. A week, maybe a little less.

8 Q. Do you recall how many times you worked out?

9 A. Probably at least two or three.

10 Q. Other than that one trip to Vegas, did you do
11 off-season conditioning anywhere other than Missouri?

12 A. I guess if you count showing up early to
13 Arizona.

14 Q. So you're talking about a week prior to spring
15 training, you would go down to Arizona by choice and you
16 would work out there?

17 A. Yeah. I guess you could say by choice, but it
18 was recommended.

19 Q. Did all of your teammates show up early?

20 A. No. A good amount, though, did.

21 Q. It was not required, though?

22 A. Not required, no.

23 Q. Okay. So other than working out in Missouri,
24 the one-week trip you took to Vegas and reporting to
25 Arizona about a week early for spring training on your